



Sony Electronics Inc.

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December 16, 2016

VIA ECFS

Brian Regan  
Associate Bureau Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
441 12<sup>th</sup> Street, SW  
Washington, DC 20006

RE: Application of Sony Corporation to Serve as a Spectrum Access System  
("SAS") Administrator  
Response to Third Request for Supplemental Information  
GN Docket 15-319

Mr. Regan:

Sony Corporation ("Sony") submits the following response to an inquiry from Commission staff regarding mechanisms for compliance with 47 C.F.R. § 96.53 in Sony's application in the above-referenced proceeding.

Specifically, Commission staff have asked for additional information about how the proposed Sony SAS would "resolve conflicting uses of the band while maintaining, as much as possible, a stable radio frequency environment" (§ 96.53(k)), and how it would "receive reports of interference and requests for additional protection from Incumbent Access users and promptly address interference issues" (§ 96.53(o)).

Sony believes that proper compliance with the Commission's Part 96 rules will prevent the vast majority of interference problems in the 3.5 GHz band. If conflicts arise however, Sony understands that it is expected to serve as the "first line of defense" to address them. As such, Sony will designate an individual point of contact, accessible by email and by telephone, to receive interference reports or requests for additional protection, and to facilitate their prompt resolution. Sony also pledges that it will be proactive in implementing any relevant guidance, standard, or best practice issued by the Commission or by other government agencies.

In addition, Sony will follow standards for the exchange of CBSD channel assignment information between SASs, which are currently under development in the Wireless Innovation Forum. Finally, as indicated in its initial proposal for certification, Sony will implement a web-based application that will be enable Commission staff and representatives of other government agencies to resolve interference immediately, with or without direct involvement by Sony. Sony will also make this application available to PAL licensees as necessary.

Sony believes that this combination of solutions will satisfy both the letter and spirit of the requirements set forth in Section 96.53.

Please contact the undersigned with any questions about this submission.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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